

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION - DETROIT

IN THE MATTER OF:

LEK MILICAJ

CHAPTER 13  
CASE NO. 22-44862-MAR  
JUDGE MARK A RANDON

Debtor

/

**TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN**

**Now Comes** the Chapter 13 Trustee, KRISPEN S. CARROLL, and files her objections pursuant to E.D. Mich. LBR 3015-3(a) and opposes confirmation of the Chapter 13 Plan where it does not comply with Bankruptcy Code provisions, 11 U.S.C. §§ 1325, 1322, other applicable provisions of Title 11 Chapter 13 and Local Bankruptcy Rules, as follows:

1. Trustee requests personal bank statements for November 2022, December 2022 and January 2023 to verify debtor's income on Amended Schedule I filed on 1/6/2023 at Dkt #40 and to verify the \$1,035.00 in estimated income taxes and Medicare and SS deductions on Amended Schedule J.
2. As debtor's Amended Schedule J reflects that debtor is separated from his spouse, Trustee questions if debtor is paying any support that is not currently accounted for on that amendment. In the event a divorce proceeding is filed, Trustee objects to the entry of a Judgment of Divorce with respect to any property settlement without obtaining prior bankruptcy court approval and requests an update as to any domestic support obligation.
3. Without accounting for any priority federal taxes, Trustee objects as debtor's Plan is underfunded based upon the priority claims filed to date.
4. As debtor's amended Schedule I indicates that debtor anticipates an increase in his income, Trustee requires that any Order Confirming Plan include a provision that

debtor provide tax returns and verification of income yearly in compliance with 11 U.S.C. § 521(f).

**Wherefore**, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's Chapter 13 Plan and for other and further relief as the Court deems appropriate, including dismissal.

Dated: February 02, 2023

OFFICE OF THE CHAPTER 13 TRUSTEE -DETROIT  
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

/s/ KRISPEN S. CARROLL-mcs  
Krispen S. Carroll (P49817)  
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Detroit, MI 48226  
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**CERTIFICATE OF MAILING**

I hereby certify that on the date indicated below, I electronically filed TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

OSIPOV BIGELMAN PC  
20700 CIVIC CENTER DR  
STE 420  
SOUTHFIELD, MI 48076

February 02, 2023

/s/ Shannon Horton  
SHANNON HORTON  
For the Office of the Chapter 13 Trustee-Detroit  
719 Griswold Street, Ste 1100  
Detroit, MI 48226  
(313) 962-5035  
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